

Docket No.: 94100417(EP)USD1X1C1D6 PDDD
Serial No.: 09/773,473

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REMARKS

I. Status

In the Office Action mailed April 25, 2003, the Examiner noted that claims 1-13 were pending and rejected claims 1-13. The applicant respectfully traverses the rejection.

II. Responsive to Communication

The Examiner indicated the Office Action mailed April 24, 2003 was responsive to a communication filed on October 9, 2002. According to our records, the Office Action mailed 24, 2003 was responsive to the filing of the Application on February 5, 2001. The Applicants respectfully request a correction of the record.

III. Oath Declaration

The applicant respectfully requests that the applicant be permitted to submit a supplemental declaration after allowance which will also include the correction noted by the Examiner.

IV. Double Patenting

The Applicants submits a Terminal Disclaimer for the purpose of overcoming the double patenting rejection of U.S. Patent 6,263,422. However, Applicants do not admit to any characterization or limitation of the claims by the Examiner, particularly any that are inconsistent with the language of the claims considered in their entirety and including all of their constituent limitations.

V. Foreign Priority

Certified copies of the priority documents EP 92306038.8, GB 9405914.4, and GB 9504046.5 were submitted in the parent application 09/307,239. Hence, applicants request that the Examiner acknowledge receipt

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of these foreign documents.

VI. Rejection of claims under 35 U.S.C. § 103(a)

Claims 1-13 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Horvath et al.

To support the allegation that Horvath et al. discloses processing stages interconnected to form a pipeline as recited in claim 1, the Examiner cites to the Abstract of Horvath et al. However, in contrast to the present invention recited in claim 1 which recites to a pipeline of processing stages, Horvath et al. discloses a machine architecture for processing image blocks by the coordinated actions of primarily two processors, an LSM and CODEC processors, operating on image blocks stored in buffers.

To support the allegation that Horvath et al. discloses standard-independent stages, the Examiner cites to column 6, lines 12-14 and column 8, lines 3-24 of Horvath et al. However, column 6, lines 12-24 discloses a processor performing various steps of an algorithm, e.g. DCT, VLC. Column 8, lines 3-23 disclose the operation of a DCTQ device. Thus, neither of these sections cited by the examiner disclose "standard-independent stages" which process data independent of a standard (e.g., MPEG, JPEG). In fact, the sections cited by the Examiner, as well as the reference of Horvath et al. as a whole, make no distinction between standard-dependent and standard-dependent processing.

To support the allegation that Horvath et al. discloses standard-dependent stages, the Examiner cites to column 3, line 63 to column 4, line 12. However, this section merely discloses a DCT device producing coefficients and is unrelated to standard-dependent processing and makes no distinction between standard-dependent and standard-independent processing.

To support the allegation that Horvath et al. discloses standard-dependent processing stages capable of reconfiguration to operate in accordance with different data encoding standards, the Examiner cites to column 1, lines 33-41 and column 5, lines 15-30. However, these sections

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merely describe the steps of the decoding process and do not disclose "dependent processing stages" as recited in claim 1. Horvath et al. in column 3, lines 51-62 discloses that the discrete cosine transform (DCT) is based on the JPEG standard. The disclosure of Horvath et al. and the subsequent algorithm described is that of a single standard. The machine of Horvath et al. is not designed to "operate in accordance with different data encoding standards" (claim 1, lines 5-6) as recited in the present invention.

To support the allegation that Horvath et al. discloses tokens providing reconfiguration information to the standard-dependent processing stages, the Examiner cites to column 1, lines 33-51. However these sections do not disclose standard-dependent processing stages providing reconfiguration information.

In summary Horvath et al. discloses an embodiment of a machine which decodes and encodes blocks of image data for a single standard. Consequently, the machine of Horvath et al. is not designed to "operate in accordance with different data encoding standards" (claim 1, lines 5-6) as recited in the present invention. As a result, Horvath et al. does not disclose, as recited in claim 1, standard-independent or standard-dependent processing stages. Furthermore, Horvath et al. does not disclose a reconfigurable stage.

Furthermore, the cited prior art does not disclose a "token" as recited in the claims of the present invention. A token of the present invention is defined in the specification as "interactive interfacing messenger package for control and /or data functions." This entails a technology more powerful than a traditional token, for example, in the context of token rings, or a traditional packet of information.

As to claim 2, to support the allegation that Horvath et al. discloses each of the tokens including an extension indicator that indicates whether additional words are present, the Examiner cites to column 5, lines 24-30 and column 8, lines 24-27. However these sections only refer to processing of blocks of data and do not disclose a token being a universal adoption unit in the form of an interactive interfacing messenger package for control and/or data functions.

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As to claims 5-7, although Horvath et al. briefly mentions "internal quantization tables" (column 7, line 8), Horvath et al., as discussed above, does not disclose processing using "tokens" and hence does not disclose a "QUANT_TABLE" token.

The Examiner rejected claims 8-13 for similar reasons as for claims 1-7. Consequently, claims 8-13 are patentable over the prior art for the same reasons as claims 1-7.

Therefore, the present invention recited in claims 1-13 is not rendered obvious by the cited prior art.

VII. Concluding Matters

In view of the foregoing remarks, it is respectfully submitted that each of the claims distinguishes over the prior art, and therefore, defines allowable subject matter. A prompt and favorable reconsideration of the rejection along with an indication of allowance of all the pending claims is respectfully requested.

Should there be any remaining questions to correct format matters, it is urged that the Examiner contact the undersigned attorney with a telephone interview to expedite and complete prosecution.

If any further fees are required in connection with the filing of this response, please change same to our Deposit Account No. 04-1175.

Respectfully submitted,

DISCOVISION ASSOCIATES



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Date: July 8, 2003

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